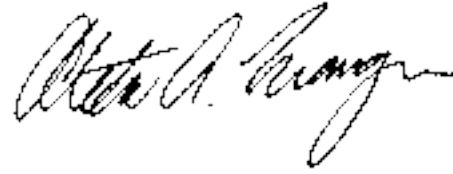


IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



UNITED STATES OF AMERICA

v.

KORBEIN SCHULTZ

Case No. 3:24-cr-00056

JUDGE TRAUGER

GOVERNMENT'S UNOPPOSED MOTION FOR A PROTECTIVE ORDER

The United States, through United States Attorney Henry C. Leventis and Assistant United States Attorney Josh Kurtzman, hereby moves, pursuant to Federal Rule of Criminal Procedure 16(d)(1), for a protective order (a proposed protective order is attached hereto) regarding discovery in this case. In support of its motion, the United States sets forth as follows:

1. On March 6, 2024, a federal grand jury returned an Indictment, charging Korbein Schultz with various violations of federal law, including Conspiracy to Gather, Transmit, or Lose Defense Information, in violation of 18 U.S.C. § 793(g); Unlawful Export of Defense Articles to China, in violation of 22 U.S.C. § 2778; Conspiracy to Unlawfully Export Defense Articles to China, in violation of 22 U.S.C. § 2778; and, Bribery of a Public Official, in violation of 18 U.S.C. § 201(b)(2)(C). From June 2022 until the time of his arrest on March 7, 2024, Schultz is alleged to have conspired with an individual, identified as Conspirator A in the Indictment, to disclose documents, writings, plans, maps, notes, and photographs relating to national defense, as well as information relating to national defense which Schultz had reason to believe could be used to injure the United States or used to the advantage of a foreign nation. Conspirator A recruited Schultz, who possessed a Top-Secret/ Secret Compartmentalized Information ("TS/SCI") security clearance, and frequently tasked him to gather documents and sensitive U.S. military information. Specifically, Conspirator A tasked Schultz with gathering information related to a variety of U.S.